

ZELDES, NEEDLE & COOPER

A PROFESSIONAL CORPORATION

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February 6, 2015

**VIA U.S. CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Jarrett R. Jenkins
334 Locust St., Apt. 1
West Hempstead, NY 11552-3044

Re: Jarrett Jenkins v. Portfolio Recovery Associates, LLC
U.S. District Court, Eastern District of New York
No. 2:14-cv-03532-SJF-AKT

Dear Mr. Jenkins:

With respect to Interrogatory No. 6 and Request for Production No. 1, we are producing herewith the load data relating to your account as well as an affidavit re initial procedures relating to processing accounts.

With respect to Request for Production No. 2, we are producing a spreadsheet reflecting matter reported on your account.

With respect to Request for Production No. 3, we are providing an affidavit confirming that there is no "chain of assignments."

With respect to Request for Production No. 4, we are producing manuals, training materials or procedures relating to the investigation of disputes.

With respect to Requests for Production Nos. 6 and 8, we are providing an affidavit confirming that there exists no general ledger entry or journal entry that is specific to the plaintiff's account.

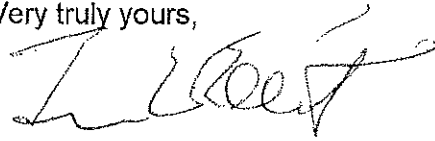
With respect to Request for Production No. 9, we are producing a copy of a Metro II Manual.

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We trust that this complies with Judge Tomlinson's recent order.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. Elliot", with a stylized flourish extending from the end.

Jonathan D. Elliot

JDE/raf
Enclosures

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JARRETT R. JENKINS,

Plaintiff,

v.

PORTFOLIO RECOVERY ASSOCIATES,
LLC,

Defendant.

No. 2:14-cv-03532-SJF-AKT

AFFIDAVIT

I, Andrew Stello, hereby state:

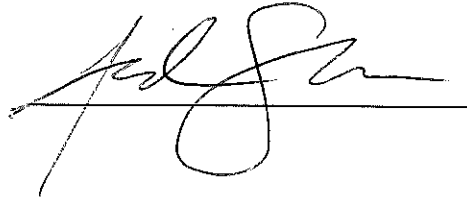
1. I am over the age of eighteen and believe in the obligations of an oath.
2. I am employed by Portfolio Recovery Associates, LLC ("PRA") as Vice President - Core Acquisitions. As such, I am familiar with the matters set forth in this affidavit.
3. I make this affidavit based upon my personal knowledge and/or the regularly maintained business records of PRA.
4. As to Request for Production No. 1, upon the acquisition of new accounts, PRA receives certain data from the seller regarding each account acquired (the "Load data"). The Load Data is entered into PRA's system of record. Prior to commencing activities PRA performs certain reviews on the account, including but not limited to, data validations; skip tracing, scrubs to rule out bankrupt accounts or other known obstacles to collection activity. It is our practice to only commence collection activity where and how allowable by law.

5. With respect to Request for Production No. 3, the plaintiff's account at issue in this action was originated by the Seller, its predecessor, or the bank had entered into a new agreement with the Cardholder with respect to any acquired accounts and the Account was acquired directly from said Seller, in a single transaction, without any intervening transactions with third parties. Accordingly, the "chain of assignment" consists solely of the Bill of Sale.

6. With respect to Request for Production Nos. 6 and 8, the transfer of plaintiff's account is part of the acquisition of a pool of thousands of accounts. The transfer of ownership of this pool of accounts is evidenced by the Bill of Sale referenced previously.

I hereby certify, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge and believe.

Date: 2/9/15

A handwritten signature in black ink, appearing to be "Adrian", written over a horizontal line.